

From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: FW: ISP site document request for Praxair pipeline replacement
Date: Tuesday, October 16, 2012 1:26:27 PM

FYI

From: McGowan, Carrie
Sent: Tuesday, October 16, 2012 1:25 PM
To: Chuck_Terbot@praxair.com
Cc: dmicnichol@ashland.com; Merrell, Raymond
Subject: RE: ISP site document request for Praxair pipeline replacement

We will start putting the information together for you- shall i send it to your address at the bottom of the email?

As far as hot work goes - as you know we are a grassed site and very concerned about fire hazard due to any hot work. That being said - once you have a hot work plan and locations where you would perform it please share it. I am sure we can work with you.

The LPH site was a site remediation site so we are subject to 1910.120 (if you are disturbing anything onsite).

Thank you,

Carrie

From: Chuck_Terbot@praxair.com [Chuck_Terbot@praxair.com]
Sent: Tuesday, October 16, 2012 12:32 PM
To: McGowan, Carrie
Cc: dmicnichol@ashland.com; Merrell, Raymond
Subject: RE: ISP site document request for Praxair pipeline replacement

Hi Carrie,

Whatever data you can send with the underground and sampling is greatly appreciated. Thanks for the help.

Praxair would need to perform hot work to weld the 40' sections of pipe together to construct the pipeline. A welding station near the pipe laydown area (wherever that is decided) is established to weld the 40 ft. sections of pipe into 80 ft. sections. and then we would stage welding approximately every 80 ft. down the railroad track near the pipeline trench. Designated fire watches and a minimum of 2 20+ pound minimum fire extinguishers are requirements for each welding crew. Torch work may also be necessary periodically to shorten pipe or to remove pipe coating to weld fittings on. This would occur in the same area. Same safety rules apply. Please let me know if this is an issue that we can work together to resolve. We are all experienced with performing this type of work inside operating refineries and petroleum terminals.

The HASP question was to determine if there are any health and safety specific requirements to excavating along the

tracks. The crews I use are hazwoper trained and we will have a HASP for operating in the LCP superfund site. I was planning on modifying the LCP HASP by updating the various work and staging areas and removing the mercury related issues (monitoring, contamination reduction zone, exclusion zone, etc.). PPE would be modified level D as conditions allow and if contamination is encountered, work would stop until a suitable plan could be developed.

regards,

Charles E. Terbot, PMP
Project Manager: Pipeline & Metering
Praxair, Inc.
Office: 716.879.7603
Cell: 716.553.8163
175 East Park Drive
Tonawanda, NY 14150-7891

"McGowan, Carrie" <cmcgowan@gaf.com>

10/16/2012 11:56 AM

To

"Chuck_Terbot@praxair.com" <Chuck_Terbot@praxair.com>, "Merrell, Raymond" <rmerrell@gaf.com>, "dmicnichol@ashland.com" <dmicnichol@ashland.com>

cc

Subject

RE: ISP site document request for Praxair pipeline replacement

Dear Chuck,

Ray is travelling and has asked me to respond to your email for the Linden Property Holdings LLC site. I am assuming Dave or Jon Gorin of the EPA will respond for the LCP site. Also, I assume you have also contacted DuPont and Conrail.

Following are our responses numbered as in your email.

- 1) We can provide as-builts of the gw conveyance system and barrier wall. We do not have any old utility drawings. You will have to contact the utility companies for their location information.
- 2) There is not much data available in this specific area. We can provide you with the Remedial Investigation Report for the site so you have what we have.
- 3) We can provide a copy of the wetlands map for the LPH site.
- 4) No hot work, lots of bug spray (but that is getting better with the cooler weather), no blocking our road. Site hours are 7-3. Watch out for wildlife. We would like at least a week notice prior to the start of work.
- 5) There really are none as we are now out of the site remediation program. Ian Curtis at NJDEP was our case manager. I do not understand your HASP question.
- 6) There is a spot on the gravel area south east of building 410 that you could use. We can show you.
- 7) Any imported material onto our site will need to meet the NJ residential soil standards and we will need to see the data prior to it arriving on-site. Once we know where the trench location will be we can notify you of any other specific soil requirements.

We can copy information you need onto disks and send it to you if that is what works for you. You can also have someone come to our location and look at hard copies.

Let me know if you have any additional questions.

Thank you,
Carrie McGowan

From: Chuck_Terbot@praxair.com [mailto:Chuck_Terbot@praxair.com]
Sent: Monday, October 15, 2012 3:02 PM
To: Merrell, Raymond; dmicnichol@ashland.com
Cc: McGowan, Carrie
Subject: ISP site document request for Praxair pipeline replacement

Good afternoon Ray,

Attached is a Praxair wish list of reference documents that would help with the nitrogen pipeline renewal effort.

- 1.) Underground utility drawings (both old, from GAF days, to present ISP projects) in the area of the Sound Shore RR tracks.
- 2.) Soil and groundwater sampling data in the area of the Sound Shore RR tracks from north end to south end of ISP Property along the RR tracks. Our planned excavations are 3.5' to 4' in depth, but I believe I may have to go under one of your site water collection lines or other water lines that feeds over the the treatment building. That excavation may be deeper. I know Praxair did a pipe relocation about 30 years back, I have pictures, but nothing else to indicate where it was. More recently the water dept. installed new lines.
- 3.) Copies of wetlands delineations or designated Freshwater wetlands in the area of the Sound Shore Branch from Grasselli south to where your road entrance to the treatment plant is located. My internet searches show none existing on the east side of the tracks.
- 4.) Site safety requirements for working inside the property.
- 5.) NJDEP contacts relating to site? HASP requirements?
- 6.) Potential locations to temporarily stage trench spoils to categorize for disposal? Probably on the order of 600 yds. or less.
- 7.) Requirements for imported sand or other material to backfill trench? Are you working with any suppliers of fill, ie.) Clean Earth. Any suppliers you have had bad experiences with?

Please let me know what information might be available and the best way to get it from GAF to Praxair. I will copy you on any additional data that has to be collected for this effort, and updated underground drawings as well.

Thank you for your help and cooperation.

regards,

Charles E. Terbot, PMP
Project Manager: Pipeline & Metering
Praxair, Inc.
Office: 716.879.7603
Cell: 716.553.8163
175 East Park Drive
Tonawanda, NY 14150-7891

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: FW: ISP site document request for Praxair pipeline replacement
Date: Tuesday, October 16, 2012 11:06:54 AM

fyi

From: Chuck_Terbot@praxair.com [Chuck_Terbot@praxair.com]
Sent: Monday, October 15, 2012 3:02 PM
To: Merrell, Raymond; dmicnichol@ashland.com
Cc: McGowan, Carrie
Subject: ISP site document request for Praxair pipeline replacement

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From: [McGowan, Carrie](#)
To: [Gorin, Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)
Cc: [McNichol, David](#)
Subject: FW: LCP HHRA
Date: Tuesday, May 29, 2012 11:48:20 AM

Jon,
Here you go!
Carrie

From: mschuck@geosyntec.com [mailto:mschuck@geosyntec.com]
Sent: Tue 5/29/2012 11:37 AM
To: McGowan, Carrie
Subject: LCP HHRA

Carrie,
The Final LCP Linden HHRA, which was submitted to the Agency in May 2011, is available for download. I have also included the three HHRA-related Response to Comments letters.

-Meghan

Please click the following link to download your files:

<http://expresssend.geosyntec.com:80/AHT/DownloadLogin.aspx?package=uKc5uU%2fP4z5GgDn%2fjNaI0mYcXQHCgr4v857jxi3vCYmria6dPUSquRvS0Ba%2buFiYmPWwC3jtUX63yJroWwfSNRGZNHKneKbtCP13BfS5ygc%3d>

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: FW: Tomorrow
Date: Monday, January 28, 2013 9:53:52 AM

Fyi – the email string so far. Looks like they are now trying for 12:30 or 1.
C

From: Robin E Lampkin
Sent: Monday, January 28, 2013 9:34 AM
To: Toft, Dennis M.; John M. Hoffman; McGowan, Carrie; Buongiorno, Diana
Subject: Re: Tomorrow

Yes I can.

From: "Toft, Dennis M." [DToft@wolffsamson.com]
Sent: 01/28/2013 02:08 PM GMT
To: John Hoffman; Robin Lampkin; Carrie McGowan; "Buongiorno, Diana" <dbuongiorno@wolffsamson.com>
Subject: RE: Tomorrow

I have a conflict at 2. Could you do it at 12:30 or 1?

From: John M. Hoffman [<mailto:jmhoffman@ashland.com>]
Sent: Monday, January 28, 2013 8:40 AM
To: Robin E Lampkin; Toft, Dennis M.; Carrie McGowan; Buongiorno, Diana
Subject: Re: Tomorrow

2PM works for me

From: Robin E Lampkin
Sent: 01/28/2013 08:18 AM EST
To: "Toft, Dennis M." <DToft@wolffsamson.com>; Carrie McGowan; John Hoffman; "Buongiorno, Diana" <dbuongiorno@wolffsamson.com>
Subject: Re: Tomorrow

I can be available anytime my selfish preference is to start @ 2 if it is this afternoon.

From: "Toft, Dennis M." [DToft@wolffsamson.com]
Sent: 01/28/2013 01:12 PM GMT
To: Robin Lampkin; Carrie McGowan; John Hoffman; "Buongiorno, Diana" <dbuongiorno@wolffsamson.com>
Subject: Re: Tomorrow

I spoke with Frank. We will set this up as a conference call and that way Jon Gorin will also be able to participate.

Frank would prefer to push the time back to early afternoon. Let me know what works.

Sent from my BlackBerry Wireless Handheld

From: Robin E Lampkin [<mailto:relampkin@ashland.com>]
Sent: Sunday, January 27, 2013 11:44 PM
To: Toft, Dennis M.; Carrie McGowan <CMcGowan@ashland.com>; John M. Hoffman <jmhoffman@ashland.com>; Buongiorno, Diana
Subject: Re: Tomorrow

Our flights have been canceled. We will need to patch in by phone. Thanks.

From: "Toft, Dennis M." [DToft@wolffsamson.com]
Sent: 01/28/2013 02:56 AM GMT
To: Carrie McGowan; John Hoffman; Robin Lampkin; "Buongiorno, Diana" <dbuongiorno@wolffsamson.com>
Subject: Tomorrow

Robin, John and Carrie,

I just got a note from Frank Cardiello that Jon Gorin is ill and won't join us tomorrow. Frank is still planning on being there, but it will be much more of a legal meeting and the technical discussion will likely need to wait.

The weather is also iffy here in the morning. Snow showers early and wintry mix after that. If your flights are delayed or cancelled, let us know. We can patch you in by phone with Frank and set up a technical meeting once Gorin is back on his feet.

Dennis

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Thank you.

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: Out of Office AutoReply: Mercury contaminated sites - solidification
Date: Friday, June 22, 2012 3:16:35 PM

I will be out of the office until monday July 2. I will not have access to email.

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov; [David McNichol](#)
Subject: RE: 10/11/12 LCP RIR Response Document
Date: Thursday, November 29, 2012 3:47:33 PM

Jon – these are specifically on the Response to comments document for the RIR that B&C sent you recently. That is on like its forth go round already.

C

From: Gorin.Jonathan@epamail.epa.gov [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Thursday, November 29, 2012 2:11 PM
To: David McNichol
Cc: McGowan, Carrie
Subject: Fw: 10/11/12 LCP RIR Response Document

Dave, Carrie, this came in soon after our call. I've only had a chance to skim it and it doesn't look too bad.

BTAG looks problematic, but will be speaking with them again next week.

No response from Diana yet, apologize.

jon

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 11/29/2012 02:07 PM -----

From: "Pavelka, Anne" <Anne.Pavelka@dep.state.nj.us>
To: Jonathan Gorin/R2/USEPA/US@EPA
Cc: "Hamill, Nancy" <Nancy.Hamill@dep.state.nj.us>, "Charles, Ann" <Ann.Charles@dep.state.nj.us>, "VanEck, David" <david.vaneck@dep.state.nj.us>
Date: 11/27/2012 10:44 AM
Subject: 10/11/12 LCP RIR Response Document

Jon

The NJDEP has reviewed the 10/11/12 RIR Response Document and has the following issues.

1.(p. 4) #2 Contamination Sources – inorganics should be included among contaminants related to the site and chlorine production. For example, the extraordinarily elevated Barium sediment concentrations (e.g., numerous data points approximately three orders of magnitude above the sediment ER-M of 48 mg/kg) must be addressed. At the September 11, 2012 site visit, a slide presentation by Brown and Caldwell indicated that Barium salts were part of the chloralkali process (Mercury cathode with Carbon plate anode in a Barium salt solution). Additionally, Zinc is highly elevated above the sediment screening criterion with a clear gradient in South Branch Creek, and, as previously commented by the NJDEP, upland soil data indicated highly elevated Zinc levels (in the range of 99,000-114,000 mg/kg, well above expected historic fill levels).

2. (p. 15) #44 AVS/SEM (Acid Volatile Sulfide/Simultaneously Extracted Metals) issue - pursuant to the section

6.4.10 of the EETG, while AVS/SEM is a potentially useful tool for assessing bioavailability and associated toxicity of sediment metals, it should not be used as a stand-alone line of evidence for evaluating risk until laboratory methods have been standardized to allow consistent interlaboratory reproducibility. AVS/SEM is most appropriately used to help interpret sediment toxicity test results. While AVS is effective in binding divalent metals in anoxic sediments, it is generally less applicable to the more oxic conditions in the upper 2 cm of sediments, considered the primary biotic zone (benthic organisms require oxygen and would not be present in its absence). Additionally, the AVS/SEM approach requires that the sediments are never disturbed or changed from the parameters examined to make the ratio calculations. Therefore, SRP would not permit elevated metals to remain in sediments based on this test, since flood events, excavation, etc., cause sediment disturbance and volatile sulfide oxidation, potentially resulting in the release of a "slug" of metals to the environment.

3.(p. 16) # 50 Historic Fill issue - It remains unclear whether the RP believes that the presence of contaminants in historic fill negates remedial responsibilities. Pursuant to the section 6.4.9 of the EETG, historic fill should be considered as any other contaminant sources to an environmentally sensitive natural resource and should be investigated pursuant to N.J.A.C. 7:26E-1.16 and 4.8. If adverse ecological effects from the historic fill are documented, remediation may be required.

4. The following comment also pertains to the Historic Fill Issue. It was transmitted to EPA in May 22, 2012 (Anne Pavelka to Jon Gorin) and needs to be addressed as part of this referral.

There have been examples in past LCP reports where examples of discharges of site specific related contamination have been reported. Therefore the fill contains site related discharges. ISP has argued that with the exception of mercury, all other inorganic contamination and nearly all organic contamination are not attributable to former site operations. Listed below is documentation that there were site specific discharges, which means that there is site specific contamination in the fill.

- from the Final Work Plan dated April 12, 2001, page 1 10, Section 1.5, discuss that the typical brine sludge composition reported by LCP contains 2% metal hydroxides;
- from the Final Work Plan dated April 12, 2001, pages 1-4 and 1-5 discuss that sulfuric and hydrochloric acids were used at the LCP site in their manufacturing processes;
- if acids were accidentally discharged and / or leaked to ground surface, this would tend to create lower pH conditions in the soils and potentially mobilize metals from soils to the groundwater. Examples of such leaks are noted in the Final Work Plan dated April 12, 2001 on page 15;
- from the Final Work Plan dated April 12, 2001, page 1-7 discusses that the northern part of the LCP site was used as a laydown area for coal piles, tanks, and drums;
- from the Final Work Plan dated April 12, 2001, page 1-9, Section 1.5, cites an Eder report of the wastes generated which includes spent lubricating oils;
- from the Final Work Plan dated April 12, 2001, page 1-2 discusses former drum storage areas;
- from the Final Work Plan dated April 12, 2001, page 1-11 discusses a drum storage pad which was used to store drums of motor oil, waste oil and other lubricants;
- from the Final Report, Interim Removal Action Mercury & Demo Work, dated February 7, 2002, page 10, Section 3.5 discusses miscellaneous waste ISP disposed of, which included a drum of oil sludge.

Feel free to contact me if you have any questions.

Thanks

Anne

Anne Pavelka, PG, CHMM
Case Manager
New Jersey Department of Environmental Protection
Bureau of Case Management
P.O. Box 420
Mail Code 401-05F
Trenton, NJ 08625

609-292-3007

Anne.Pavelka@dep.state.nj.us

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Cc: [David McNichol](#)
Subject: RE: 10/11/12 LCP RIR Response Document
Date: Thursday, November 29, 2012 3:33:15 PM

I am in linden. 908.474.5101. Leaving in a few minutes however. Tomorrow?
C

From: Gorin.Jonathan@epamail.epa.gov [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Thursday, November 29, 2012 2:58 PM
To: McGowan, Carrie
Cc: David McNichol
Subject: RE: 10/11/12 LCP RIR Response Document

Carrie, i'm on a call - when i get off (an hour or so) i'll call you.

let me know the number i can reach you.

From: "McGowan, Carrie" <CMcGowan@ashland.com>
To: Jonathan Gorin/R2/USEPA/US@EPA, "David McNichol" <DMcNichol@ashland.com>
Date: 11/29/2012 02:49 PM
Subject: RE: 10/11/12 LCP RIR Response Document

Jon,

We should discuss these as it is unclear what response would be needed to these comments. Many of these issues have been discussed numerous times. For instance in number (1.) we have repeatedly said that barium was used on site and it is addressed in the documents. No where do we say that barium will not be addressed in the sediments. However as you know barium is not much of an ecological concern so it will be addressed when we address the mercury and other contaminant issues in SBC. Zinc is not a site contaminant and elevated detections on-site do not change the fact. We did not ignore those detections however - we have always included maps showing any contaminant detected above the non-res standards.

And as for the historic fill comments I am just exhausted. The beginning of comment 3. is frankly insulting. I do not know how we could be clearer. And all of #4 is information we supplied. Clearly we are not hiding the operational history of the site by any of the operators. The fact remains that many contaminants present onsite are due to historic fill being placed on-site. We have never said that we are not including historic fill areas in our remedial plans.

Lets schedule a call to discuss how these comments affect the final RIR and the progress moving forward.

Carrie

From: Gorin.Jonathan@epamail.epa.gov [<mailto:Gorin.Jonathan@epamail.epa.gov>]
Sent: Thu 11/29/2012 2:10 PM
To: David McNichol
Cc: McGowan, Carrie
Subject: Fw: 10/11/12 LCP RIR Response Document

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----- Forwarded by Jonathan Gorin/R2/USEPA/US on 11/29/2012 02:07 PM -----

From: "Pavelka, Anne" <Anne.Pavelka@dep.state.nj.us>
To: Jonathan Gorin/R2/USEPA/US@EPA
Cc: "Hamill, Nancy" <Nancy.Hamill@dep.state.nj.us>, "Charles, Ann" <Ann.Charles@dep.state.nj.us>, "VanEck, David" <david.vaneck@dep.state.nj.us>
Date: 11/27/2012 10:44 AM
Subject: 10/11/12 LCP RIR Response Document

Jon

The NJDEP has reviewed the 10/11/12 RIR Response Document and has the following issues.

1.(p. 4) #2 Contamination Sources – inorganics should be included among contaminants related to the site and chlorine production. For example, the extraordinarily elevated Barium sediment concentrations (e.g., numerous data points approximately three orders of magnitude above the sediment ER-M of 48 mg/kg) must be addressed. At the September 11, 2012 site visit, a slide presentation by Brown and Caldwell indicated that Barium salts were part of the chloralkali process (Mercury cathode with Carbon plate anode in a Barium salt solution). Additionally, Zinc is highly elevated above the sediment screening criterion with a clear gradient in South Branch Creek, and, as previously commented by the NJDEP, upland soil data indicated highly elevated Zinc levels (in the range of 99,000-114,000 mg/kg, well above expected historic fill levels).

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- from the Final Work Plan dated April 12, 2001, pages 1-4 and 1-5 discuss that sulfuric and hydrochloric acids were used at the LCP site in their manufacturing processes;
- if acids were accidentally discharged and / or leaked to ground surface, this would tend to create lower pH conditions in the soils and potentially mobilize metals from soils to the groundwater. Examples of such leaks are noted in the Final Work Plan dated April 12, 2001 on page 15;
- from the Final Work Plan dated April 12, 2001, page 1-7 discusses that the northern part of the LCP site was used as a laydown area for coal piles, tanks, and drums;
- from the Final Work Plan dated April 12, 2001, page 1-9, Section 1.5, cites an Eder report of the wastes generated which includes spent lubricating oils;
- from the Final Work Plan dated April 12, 2001, page 1-2 discusses former drum storage areas;
- from the Final Work Plan dated April 12, 2001, page 1-11 discusses a drum storage pad which was used to store drums of motor oil, waste oil and other lubricants;
- from the Final Report, Interim Removal Action Mercury & Demo Work, dated February 7, 2002, page 10, Section 3.5 discusses miscellaneous waste ISP disposed of, which included a drum of oil sludge.

Feel free to contact me if you have any questions.

Thanks

Anne

Anne Pavelka, PG, CHMM
Case Manager
New Jersey Department of Environmental Protection
Bureau of Case Management

P.O. Box 420
Mail Code 401-05F
Trenton, NJ 08625

609-292-3007

Anne.Pavelka@dep.state.nj.us

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov; [David McNichol](#)
Subject: RE: 10/11/12 LCP RIR Response Document
Date: Thursday, November 29, 2012 2:48:59 PM

Jon,

We should discuss these as it is unclear what response would be needed to these comments. Many of these issues have been discussed numerous times. For instance in number (1.) we have repeatedly said that barium was used on site and it is addressed in the documents. Nowhere do we say that barium will not be addressed in the sediments. However as you know barium is not much of an ecological concern so it will be addressed when we address the mercury and other contaminant issues in SBC. Zinc is not a site contaminant and elevated detections on-site do not change the fact. We did not ignore those detections however - we have always included maps showing any contaminant detected above the non-res standards.

And as for the historic fill comments I am just exhausted. The beginning of comment 3. is frankly insulting. I do not know how we could be clearer. And all of #4 is information we supplied. Clearly we are not hiding the operational history of the site by any of the operators. The fact remains that many contaminants present onsite are due to historic fill being placed on-site. We have never said that we are not including historic fill areas in our remedial plans.

Lets schedule a call to discuss how these comments affect the final RIR and the progress moving forward.

Carrie

From: Gorin.Jonathan@epamail.epa.gov [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Thu 11/29/2012 2:10 PM
To: David McNichol
Cc: McGowan, Carrie
Subject: Fw: 10/11/12 LCP RIR Response Document

Dave, Carrie, this came in soon after our call. I've only had a chance to skim it and it doesn't look too bad.

BTAG looks problematic, but will be speaking with them again next week.

No response from Diana yet, apologize.

jon

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 11/29/2012 02:07 PM -----

From: "Pavelka, Anne" <Anne.Pavelka@dep.state.nj.us>
To: Jonathan Gorin/R2/USEPA/US@EPA
Cc: "Hamill, Nancy" <Nancy.Hamill@dep.state.nj.us>, "Charles, Ann" <Ann.Charles@dep.state.nj.us>, "VanEck, David" <david.vaneck@dep.state.nj.us>
Date: 11/27/2012 10:44 AM
Subject: 10/11/12 LCP RIR Response Document

Jon

The NJDEP has reviewed the 10/11/12 RIR Response Document and has the following issues.

1.(p. 4) #2 Contamination Sources – inorganics should be included among contaminants related to the site and chlorine production. For example, the extraordinarily elevated Barium sediment concentrations (e.g., numerous data points approximately three orders of magnitude above the sediment ER-M of 48 mg/kg) must be addressed. At the September 11, 2012 site visit, a slide presentation by Brown and Caldwell indicated that Barium salts were part of the chloralkali process (Mercury cathode with Carbon plate anode in a Barium salt solution). Additionally, Zinc is highly elevated above the sediment screening criterion with a clear gradient in South Branch Creek, and, as previously commented by the NJDEP, upland soil data indicated highly elevated Zinc levels (in the range of 99,000-114,000 mg/kg, well above expected historic fill levels).

2. (p. 15) #44 AVS/SEM (Acid Volatile Sulfide/Simultaneously Extracted Metals) issue - pursuant to the section 6.4.10 of the EETG, while AVS/SEM is a potentially useful tool for assessing bioavailability and associated toxicity of sediment metals, it should not be used as a stand-alone line of evidence for evaluating risk until laboratory methods have been standardized to allow consistent interlaboratory reproducibility. AVS/SEM is most appropriately used to help interpret sediment toxicity test results. While AVS is effective in binding divalent metals in anoxic sediments, it is generally less applicable to the more oxic conditions in the upper 2 cm of sediments, considered the primary biotic zone (benthic organisms require oxygen and would not be present in its absence). Additionally, the AVS/SEM approach requires that the sediments are never disturbed or changed from the parameters examined to make the ratio calculations. Therefore, SRP would not permit elevated metals to remain in sediments based on this test, since flood events, excavation, etc., cause sediment disturbance and volatile sulfide oxidation, potentially resulting in the release of a “slug” of metals to the environment.

3.(p. 16) # 50 Historic Fill issue - It remains unclear whether the RP believes that the presence of contaminants in historic fill negates remedial responsibilities. Pursuant to the section 6.4.9 of the EETG, historic fill should be considered as any other contaminant sources to an environmentally sensitive natural resource and should be investigated pursuant to N.J.A.C. 7:26E-1.16 and 4.8. If adverse ecological effects from the historic fill are documented, remediation may be required.

4. The following comment also pertains to the Historic Fill Issue. It was transmitted to EPA in May 22, 2012 (Anne Pavelka to Jon Gorin) and needs to be addressed as part of this referral.

There have been examples in past LCP reports where examples of discharges of site specific related contamination have been reported. Therefore the fill contains site related discharges. ISP has argued that with the exception of mercury, all other inorganic contamination and nearly all organic contamination are not attributable to former site operations. Listed below is documentation that there were site specific discharges, which means that there is site specific contamination in the fill.

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Thanks

Anne

Anne Pavelka, PG, CHMM
Case Manager
New Jersey Department of Environmental Protection
Bureau of Case Management
P.O. Box 420
Mail Code 401-05F
Trenton, NJ 08625

609-292-3007

Anne.Pavelka@dep.state.nj.us

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: RE: 10/11/12 LCP RIR Response Document
Date: Tuesday, December 11, 2012 6:26:18 PM

Jon – I just got home from refresher training. Are you in tomorrow?

C

From: Gorin.Jonathan@epamail.epa.gov [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Tuesday, December 11, 2012 3:27 PM
To: McGowan, Carrie
Subject: RE: 10/11/12 LCP RIR Response Document

Carrie, please call me when you get a chance

212 637 4361

jon

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Cc: [McNichol, David](#)
Subject: RE: bedrock GW criteria
Date: Tuesday, May 29, 2012 11:05:02 AM

I am working on getting the final version of the HHRA over to you in electronic form – didn't want you to think we had forgotten.

C

From: Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]
Sent: Tuesday, May 29, 2012 9:49 AM
To: McGowan, Carrie
Cc: McNichol, David
Subject: RE: bedrock GW criteria

Sounds good. Weekend was restful, hope yours was as well.

jon

From: "McGowan, Carrie" <CMcGowan@ashland.com>
To: Jonathan Gorin/R2/USEPA/US@EPA, "McNichol, David" <DMcNichol@ashland.com>
Date: 05/29/2012 09:46 AM
Subject: RE: bedrock GW criteria

Jon,
We are meeting with our consultants the end of this week to go over everything we covered last week.
We wanted to do that prior to sending out the email.
Hope you had a nice long weekend!

C

From: Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]
Sent: Tue 5/29/2012 9:42 AM
To: McNichol, David
Cc: McGowan, Carrie
Subject: bedrock GW criteria

Carrie, Dave, could you try to get an e-mail to Anne requesting assistance developing the alt criteria. It appears she's already looking into this, and asked for an e-mail from you with the request (i realize you've already made a request two years ago).

thanks, jon

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov; [McNichol, David](#)
Subject: RE: bedrock GW criteria
Date: Tuesday, May 29, 2012 9:46:23 AM

Jon,
We are meeting with our consultants the end of this week to go over everything we covered last week.
We wanted to do that prior to sending out the email.
Hope you had a nice long weekend!

C

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To: McNichol, David
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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov; [David McNichol](#)
Subject: RE: BERA Comments
Date: Wednesday, August 15, 2012 7:27:45 PM

Hi Jon,

Yes dave is on vacation this week. We will look them over and get back to you.

Thanks,

Carrie

From: Jonathan Gorin [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Wednesday, August 15, 2012 5:29 PM
To: McGowan, Carrie; David McNichol
Subject: BERA Comments

Hey Dave and Carrie. Below are BTAGs responses to your responses to the BERA comments. Their comments are in plain text, my commentary is in bold/italics.

Note, I went back and forth with them several times, and these seem to be the comments that need to be addressed in order for us to approve the BERA. I'm out tomorrow and Friday (i think Dave's in Maine anyway), but will be around next week to discuss the one or two which you may find troublesome.

Jon

1) Specific Comments 9, 10, 11, 12 b-e, and 29: Pursuant to ERAGS, testable risk hypotheses (risk questions), assessment endpoints, and measurement endpoints must be developed for all appropriate feeding guilds, therefore these comments remains valid. Further, contrary to the response, the Problem Formulation Document (PFD) did not indicate that these exposure pathways should be eliminated.

I asked for clarification and BTAG responded as below.

As per the BTAG's recommendations, additional assessment endpoints are necessary to better define the extent of contamination and risk within the aquatic (e.g. sediment) and terrestrial (e.g. soil) ecosystem. In order to develop preliminary remedial goals and remedial action objectives, EPA must have a clear understanding of the risk associated with the contaminants of concern (COCs) and their impact to the variety of trophic levels at the Site. The requested food chain modeling may result in the development of more protective PRGs which could potentially affect the selection of appropriate remedial technologies and the scope of the clean-up effort. Therefore, it is strongly recommended that the requested assessment endpoints be addressed by using site-specific data to determine the risk to these additional receptors (estuarine fish, piscivorous mammals, sediment-probing birds, insectivorous birds, carnivorous mammals and carnivorous birds).

I think this comment (and possibly #6 below) is the only ones that may give you some agita. If this can be done without much stress, I ask that you do it. It won't substantially change the remedy one way or the other, and it allows us (me) so demonstrate that the guidance (ERAGS) was carefully followed.

2) Specific Comments 13, 19a, 24, and 25b: "Regional Arthur Kill background" contaminant concentrations and reference location data must have BTAG concurrence, since these contaminant levels factor quantitatively in risk characterization and contaminant delineation and remediation decisions. The location of these "regional" data (Old Place Creek) must be identified in the text as indicated in subsequent responses.

EPA never approved of this as a reference location (or any other place as a reference location). That needs to be stated in the text when OPC is discussed.

3) Specific Comment 19b: The response should clearly indicate that the text will be modified, as per the comment.

Please simply modify the sentence so it notes that the higher arsenic concentrations in sediments could be due to accumulation in those depositional areas.

4) Specific Comment 19c: The comment stands; the site may be a source of these constituents.

I think BTAG is confused on this, in that I think what you are saying is "it doesn't matter if they're regional or site related." My response to that is if it doesn't matter then you don't need to assume the origin of the PAHs and PCDDs one way or the other.

5) Specific Comment 21: The complete citation for Mason et al., 2006 is as follows: Mason, R.P., D. Heyes, and A. Sveinsdottir, 2006. Methylmercury Concentrations in Fish from Tidal Waters of The Chesapeake Bay, Arch. Environ. Contam. Toxicol. 51, 425–437.

Please make this change.

6) Specific Comment 25c: Contaminants exceedances should be included in the appropriate section of the BERA.

Please modify the table to include all exceedances.

7) Specific Comment 30: The published sources used to obtain dietary composition and incidental ingestion factors should be cited.

Please include these references.

8) Specific Comment 34: The comment remains; the statement regarding "limited support for wildlife populations" should be removed.

Please remove the statement.

9) Specific Comment 35: This comment remains; the statement that "exposure is likely to be only periodical" should be removed.

Please remove the statement.

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Cc: [John M. Hoffman](#)
Subject: RE: Comment Letters
Date: Wednesday, January 09, 2013 10:39:50 AM

Jon,

OK on the BERA but I am not sure they can do the modeling and revise the report in 30 days. I will contact Geosyntec.

Ok on the offsite ditch.

OK on the FS.

What about the RI? There are still outstanding comments.

Carrie

From: Gorin.Jonathan@epamail.epa.gov [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Wednesday, January 09, 2013 9:15 AM
To: McGowan, Carrie
Cc: John M. Hoffman
Subject: RE: Comment Letters

Ok, thanks. Here's how it looks like it's going to go.

You'll get a letter with the remaining comments on the BERA. This letter will ask that other species be modelled. We discussed this at the meeting, and BTAG remains adamant. It follows RAGs so it's the right thing to do. i told that to Dave hopefully he relayed the info. Once that's done, the BERA is approvable - i'm asking for the revised BERA by Feb. 15 (ok?).

You'll get a short approval letter for the off-site ditch RI work, contingent on some very minor changes. All you need to do is send in the final copy with a cover letter indicating the changes were made.

You'll get a letter with the FS comments. The comments we've been discussing, the ones you've seen previously in draft. Nothing in that letter is new and just about all of the comments have been addressed by Gary either through draft changes to the text or through discussions. So why am i resending them? I think it would be best to have a paper trail of official letters showing the comments, and then a final document/cover letter showing the responses. This information will become part of the Admin Record.

I hope to get the BERA letter out today, the rest shall follow.

jon

From: "McGowan, Carrie" <CMcGowan@ashland.com>
To: Jonathan Gorin/R2/USEPA/US@EPA
Cc: "John M. Hoffman" <jmhoffman@ashland.com>
Date: 01/08/2013 09:48 AM
Subject: RE: Comment Letters

Jon,

The PM for Ashland will be:

John Hoffman

Project Manager

Ashland Inc.

EH&S, Remediation

500 Hercules Road

Wilmington, DE 19808-1599

302-995-3485

He is copied on this email so you also have his email address.

And John – you now have the email address of Jon Gorin – the EPA RPM for LCP!

Thanks,

Carrie

From: Gorin.Jonathan@epamail.epa.gov [<mailto:Gorin.Jonathan@epamail.epa.gov>]

Sent: Monday, January 07, 2013 4:21 PM

To: McGowan, Carrie

Subject: Comment Letters

Carrie, who gets the comment letters?

Please send name, current title, address, company (assume Ashland) etc.

thanks, jon

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: RE: Comment Letters
Date: Monday, January 07, 2013 6:41:54 PM

Ok – I was going to draft you an official letter tomorrow – I will get the info and email it and then send an official letter!

C

From: Gorin.Jonathan@epamail.epa.gov [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Monday, January 07, 2013 4:21 PM
To: McGowan, Carrie
Subject: Comment Letters

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Cc: [John M. Hoffman](#)
Subject: RE: Comment Letters
Date: Thursday, January 10, 2013 12:54:48 PM

Thank you.
Carrie

From: Gorin.Jonathan@epamail.epa.gov [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Thu 1/10/2013 12:53 PM
To: McGowan, Carrie
Cc: John M. Hoffman
Subject: RE: Comment Letters

Ok, here's the comments. If the letter hasn't been signed yet, i'll change it to February 28th. If Geosyntec can't make that, just ask for an extension mid-Feb

From: "McGowan, Carrie" <CMcGowan@ashland.com>
To: Jonathan Gorin/R2/USEPA/US@EPA
Cc: "John M. Hoffman" <jmhoffman@ashland.com>
Date: 01/10/2013 12:47 PM
Subject: RE: Comment Letters

Geosyntec does not believe they can revise the BERA including the new modeling and get it through the review process and to you by Feb. 15. We request additional time - perhaps and extra 30 days.

Thanks,
Carrie

From: Gorin.Jonathan@epamail.epa.gov [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Wed 1/9/2013 9:14 AM
To: McGowan, Carrie
Cc: John M. Hoffman
Subject: RE: Comment Letters

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I hope to get the BERA letter out today, the rest shall follow.

jon

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Subject: RE: Comment Letters

Jon,

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Project Manager

Ashland Inc.

EH&S, Remediation

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And John – you now have the email address of Jon Gorin – the EPA RPM for LCP!

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Cc: [John M. Hoffman](#)
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Cc: "John M. Hoffman" <jmnhoffman@ashland.com>
Date: 01/08/2013 09:48 AM
Subject: RE: Comment Letters

Jon,

The PM for Ashland will be:

John Hoffman

Project Manager

Ashland Inc.

EH&S, Remediation

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And John – you now have the email address of Jon Gorin – the EPA RPM for LCP!

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Cc: [John M. Hoffman](#)
Subject: RE: Comment Letters
Date: Thursday, January 10, 2013 12:47:56 PM

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Carrie

From: Gorin.Jonathan@epamail.epa.gov [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Wed 1/9/2013 9:14 AM
To: McGowan, Carrie
Cc: John M. Hoffman
Subject: RE: Comment Letters

Ok, thanks. Here's how it looks like it's going to go.

You'll get a letter with the remaining comments on the BERA. This letter will ask that other species be modelled. We discussed this at the meeting, and BTAG remains adamant. It follows RAGs so it's the right thing to do. i told that to Dave hopefully he relayed the info. Once that's done, the BERA is approvable - i'm asking for the revised BERA by Feb. 15 (ok?).

You'll get a short approval letter for the off-site ditch RI work, contingent on some very minor changes. All you need to do is send in the final copy with a cover letter indicating the changes were made.

You'll get a letter with the FS comments. The comments we've been discussing, the ones you've seen previously in draft. Nothing in that letter is new and just about all of the comments have been addressed by Gary either through draft changes to the text or through discussions. So why am i resending them? I think it would be best to have a paper trail of official letters showing the comments, and then a final document/cover letter showing the responses. This information will become part of the Admin Record.

I hope to get the BERA letter out today, the rest shall follow.

jon

From: "McGowan, Carrie" <CMcGowan@ashland.com>
To: Jonathan Gorin/R2/USEPA/US@EPA
Cc: "John M. Hoffman" <jmhoffman@ashland.com>
Date: 01/08/2013 09:48 AM
Subject: RE: Comment Letters

Jon,

The PM for Ashland will be:

John Hoffman

Project Manager

Ashland Inc.

EH&S, Remediation

500 Hercules Road

Wilmington, DE 19808-1599

302-995-3485

He is copied on this email so you also have his email address.

And John – you now have the email address of Jon Gorin – the EPA RPM for LCP!

Thanks,

Carrie

From: Gorin.Jonathan@epamail.epa.gov [<mailto:Gorin.Jonathan@epamail.epa.gov>]

Sent: Monday, January 07, 2013 4:21 PM

To: McGowan, Carrie

Subject: Comment Letters

Carrie, who gets the comment letters?

Please send name, current title, address, company (assume Ashland) etc.

thanks, jon

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: RE: Follow-up to yesterday's meeting.
Date: Wednesday, September 12, 2012 2:26:20 PM

Great! Yes - I think she is a great addition. Wants to make progress and deal with things as they come up.

Enjoy this beautiful day.

C

From: Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]
Sent: Wed 9/12/2012 2:07 PM
To: McGowan, Carrie
Subject: RE: Follow-up to yesterday's meeting.

ok, thanks for clearing that up.

I saw it was mailed to Gwen, so i asked Anne to try to track it down, she found it. Problem solved. (I like Anne).

jon

From: "McGowan, Carrie" <CMcGowan@ashland.com>
To: Jonathan Gorin/R2/USEPA/US@EPA
Date: 09/12/2012 01:59 PM
Subject: RE: Follow-up to yesterday's meeting.

Yes - the complete draft RI text was provided with highlighted changes for the Ditch work and the tables and drawings for the ditch work were included. It isn't really a completely revised RI because it doesn't address comments raised by EPA and NJDEP on the RI report and doesn't include everything (tables and figures) in the original RI. However that is the version I would send to NJDEP because it does have the results of the ditch work. I just wanted to make it clear that once we are done with the back and forth on all the RI comments we will issue a revised RI.

C

From: Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]
Sent: Wed 9/12/2012 9:48 AM
To: McGowan, Carrie
Subject: RE: Follow-up to yesterday's meeting.

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From: "McGowan, Carrie" <CMcGowan@ashland.com>
To: Jonathan Gorin/R2/USEPA/US@EPA, "David McNichol" <DMcNichol@ashland.com>
Date: 09/12/2012 09:37 AM
Subject: RE: Follow-up to yesterday's meeting.

Just a few notes on your email.

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I don't have anything else really to add. I thought the meeting went well. Everyone seemed to come ready to participate.

Thanks,
Carrie

From: Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]
Sent: Wed 9/12/2012 9:03 AM
To: McGowan, Carrie; David McNichol
Subject: Follow-up to yesterday's meeting.

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Here's a really brief summary, please let me know if i missed anything (i'm also checking with Diana).

EPA and DEP are ok with the alternatives presented in the FS. However, some outstanding issues need to be addressed in the RI/FS and BERA.

- 1) Is the Hg contamination in the bedrock layer from GAF? (David, Diana)
- 2) ISP/Ashland want the Class IIIB criteria (i.e., surface water criteria) to be applicable at the "point of compliance" by which they mean the monitoring wells closes to the Arthur Kill. Wording needs to be prepared that is acceptable to all parties (Jon).
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Also, unrelated to this site, I will try to get the Piles Creek data from NOAA and provide it to you and DEP.

I still need Lora's ok with the latest FS changes (the COPCs especially) and need BTAG's response to #3 above. Once I get that, I'll edit the latest round of draft RI, FS and BERA comments to remove points I

think we agreed on yesterday (arsenic for example) and send them as final.

Oh, one last thing, did Scott send the Dec 2011 RI to Frank F or anyone else at DEP? If so, Anne may be able to track it down.

jon

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: RE: Follow-up to yesterday's meeting.
Date: Wednesday, September 12, 2012 1:59:04 PM

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov; [David McNichol](#)
Subject: RE: Follow-up to yesterday's meeting.
Date: Wednesday, September 12, 2012 9:37:55 AM

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov; [John M. Hoffman](#)
Subject: RE: FS comments
Date: Thursday, February 07, 2013 5:23:04 PM

No word back yet on the rogue tank. I reached out to Phillips 66 earlier this week but heard nothing.
C

From: Gorin.Jonathan@epamail.epa.gov [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Thursday, February 07, 2013 5:11 PM
To: McGowan, Carrie; John M. Hoffman
Subject: FS comments

Hi John and Carrie, apparently the meeting with DEP went well.

The final FS comment letter is awaiting my branch chief's signature. I'm not sure she'll get to it tonight, and i'm not in the office tomorrow, so i figured i'd e-mail you the comments now.

None of these should be a surprise, nor do i believe they will be difficult to address. If Gary has questions, or wants to check on a response before making a revision, that's fine of course.

Also, the draft revisions Cornerstone has already sent me (e.g., New Section 2.6, revised 2.3 etc) are acceptable except for the following, which again shouldn't be a surprise:

COPCs: The list of COPCs does not include all COPCs carried through the HHRA (RAGS Part D, Table 10s). Please ensure that ALL identified COPCs from the risk assessments are included as COPCs in the FS. Additionally, arsenic in sediment also posed an unacceptable human health risk.

I'll try to get you the final RI comments next week, followed by the Off Site Ditch approval letter.

Jon

ps, any word on that fiberglass tank?

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: RE: FS hard copy
Date: Tuesday, July 10, 2012 9:08:51 AM

Consider it done!

From: Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]
Sent: Tuesday, July 10, 2012 9:07 AM
To: McGowan, Carrie
Subject: RE: FS hard copy

Thanks, his info is below.

Edwin F. Barth, Ph.D, P.E., C.I.H., R.S.
Office of Research and Development
U.S. Environmental Protection Agency
26 W. Martin Luther King Drive
Cincinnati, OH 45268
Telephone: (513)-569-7669
Fax: (513)-569-7158
E-mail: barth.ed@epa.gov

From: "McGowan, Carrie" <CMcGowan@ashland.com>
To: Jonathan Gorin/R2/USEPA/US@EPA
Date: 07/10/2012 08:59 AM
Subject: RE: FS hard copy

Jon,

I do not have an extra copy but I am happy to have one sent to him. Cornerstone can send it to him (I can't print the bigger maps). Please just send me his name and address and we will get one over to him. I have to have a hard copy myself – I am not good at reading the electronic versions.

Good to see you too. I found that meeting very interesting.

Carrie

From: Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]
Sent: Tuesday, July 10, 2012 8:16 AM
To: McGowan, Carrie
Subject: FS hard copy

Carrie, good seeing you yesterday.

Would you have an extra hard copy of the draft FS? The ORD person who advised me on solidification has taken an interest in the site. He would like a hard copy rather than the electronic. He's been very helpful lately, and is a lot cheaper (free right now) than CDM.

thanks, jon

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: RE: FS hard copy
Date: Tuesday, July 10, 2012 8:59:25 AM

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: RE: FW: LCP HHRA
Date: Tuesday, May 29, 2012 1:41:13 PM

thanks jon!

From: Jonathan Gorin [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Tue 5/29/2012 1:37 PM
To: McGowan, Carrie
Cc: McNichol, David
Subject: Re: FW: LCP HHRA

I just got the FS comments from DEP. They're dated 5/15, not sure what took it so long to come in, but they're here.

I'll send them to you once i go through them.

jon

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov; [McNichol, David](#)
Subject: RE: LCP - Technical Impractability waiver
Date: Tuesday, February 21, 2012 11:47:16 AM

Thanks for the heads up Jon!
Enjoy this taste of spring.

Carrie

From: Jonathan Gorin [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Tue 2/21/2012 11:37 AM
To: McNichol, David
Cc: McGowan, Carrie
Subject: LCP - Technical Impractability waiver

Hey Dave and Carrie, i went through the alts with Kim, Carole, they're ok with them. I will be sending out the comment letter next week, i still need to discuss a few things with CDM.

Short story, the only *major* difference is we'll be asking that disposal for building debris be considered for all alts. I have some other comments about PRGs, surface water standards, how class IIIB gw is regulated, etc.

One thing, as the shallow groundwater won't meet NJGWS, i'd expect any remedy will need a TI waiver. An example is attached for you to ponder or begin as you chose.

jon

ps, this is one complicated FS, i think Gary did a good job keeping it focussed.

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Cc: [David McNichol](#)
Subject: RE: LCP meeting with DEP
Date: Wednesday, July 18, 2012 10:37:29 AM

Jon,
September 7 or 14 are good. 25 is not.
We will be sending you a draft letter on the issue shortly.
C

From: Jonathan Gorin [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Mon 7/2/2012 3:39 PM
To: McGowan, Carrie
Cc: David McNichol
Subject: LCP meeting with DEP

Carrie, Dave, DEP cannot meet until Sept. Here's the dates they have open: Sept 7, 14 and 25

Any preference?

jon

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From: [McGowan, Carrie](#)
To: [Gorin.Jonathan@epamail.epa.gov](#); [Cardiello.Frank@epamail.epa.gov](#)
Cc: [David McNichol](#)
Subject: RE: Permitting question
Date: Monday, October 22, 2012 11:01:44 AM

We put down ISP.

C

From: Gorin.Jonathan@epamail.epa.gov [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Monday, October 22, 2012 8:23 AM
To: Cardiello.Frank@epamail.epa.gov
Cc: McGowan, Carrie; David McNichol
Subject: Fw: Permitting question

Dave, Carrie, who do you put down as generator when you send stuff off-site?

jon

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 10/22/2012 08:21 AM -----

From: Chuck_Terbot@praxair.com
To: Jonathan Gorin/R2/USEPA/US@EPA
Date: 10/19/2012 04:07 PM
Subject: Re: Permitting question

Jon,

In the process of reviewing the AOC internally. The question came up with respect to the following statement in paragraph 27 on page 7. Can you please help me answer it?

"Praxair shall be the designated generator for all materials leaving the Site with respect to work conducted by Praxair."

Typically Praxair lists the property owner's name as the generator because with pipeline work Praxair does not own the property. The property owner typically has a Generator USEPA ID# or a NJDEP generator ID: Praxair lists itself as the customer on the waste disposal form. Praxair does not have a problem covering the costs associated with the sampling and disposal.

Does the EPA have a number for the LCP site and is it possible to operate in this manner?
Praxair does not want to be considered a generator.

regards,

Charles E. Terbot, PMP
Project Manager: Pipeline & Metering
Praxair, Inc.
Office: 716.879.7603

Cell: 716.553.8163
175 East Park Drive
Tonawanda, NY 14150-7891

Jonathan Gorin <Gorin.Jonathan@epamail.epa.gov>

10/16/2012 01:05 PM

To: Chuck_Terbot@praxair.com
cc: Frank Cardello <Cardello.Frank@epamail.epa.gov>
Subject: Re: Permitting question

Chuck, for the remediation on-site we do not need NJDEP permits, we just need to show we're meeting what the permits would say ("permit equivalency"). Since your work is unrelated to the cleanup, I imagine you'd need the permits, but I'm not sure.

Frank, any idea?

jon

From: Chuck_Terbot@praxair.com
To: Jonathan Gorin/R2/USEPA/US@EPA
Date: 10/16/2012 12:47 PM
Subject: Permitting question

Hi Jon,

With respect to superfund site in NJ that is to be remediated. It is under EPA oversight. Do the NJDEP waterfront development, wetlands, and other assorted permits still apply or do we operate on EPA directive based on our proposed and EPA approved workplans? If NJDEP permitting is applicable do we operate as normal with copy to you, or is there some other process?

regards,

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From: [McGowan, Carrie](#)
To: [Pavelka, Anne](#)
Cc: Gorin.Jonathan@epamail.epa.gov; [David McNichol](#)
Subject: RE: September LCP Meeting
Date: Thursday, July 26, 2012 10:08:49 AM

Anne,

Ok – We know the Sept 7 and 25 are not good so we are working on one of the other three. I will let you know what works for us. We will also let you know if there are any other specific issues that we would like to discuss.

Thank you,

Carrie

From: Pavelka, Anne [mailto:Anne.Pavelka@dep.state.nj.us]
Sent: Thursday, July 26, 2012 10:05 AM
To: McGowan, Carrie
Cc: 'Jon Gorin (Gorin.Jonathan@epamail.epa.gov)'; [David McNichol](#)
Subject: September LCP Meeting

Carrie

All the dates that were proposed for the September meeting are still fine.

As we discussed, the NJDEP would like Ashland to make a presentation of the FS alternatives and discuss the pros and cons of each. A brief summary of the site history and distribution of contamination in the soil and ground water should be included since everyone may not be familiar with the site. The NJDEP can discuss the Class IIIB criteria, if necessary. Also, there should be a discussion of any specific issues related to agency comments that Ashland has received.

Let me know if you have any other issues.

Thanks

Anne

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From: [McGowan, Carrie](#)
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Cc: Gorin.Jonathan@epamail.epa.gov; [David McNichol](#)
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Sent: Thursday, July 26, 2012 10:05 AM
To: McGowan, Carrie
Cc: 'Jon Gorin (Gorin.Jonathan@epamail.epa.gov)'; [David McNichol](#)
Subject: September LCP Meeting

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: RE: Tank
Date: Monday, January 14, 2013 11:25:07 AM

I will try to give you a call later this afternoon.

C

From: Gorin.Jonathan@epamail.epa.gov [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Monday, January 14, 2013 7:08 AM
To: McGowan, Carrie
Subject: Tank

Hey Carrie, i got your message this am (i was out Friday). I'm heading to Brick in a bit, but should be back here around 1:00 if you want to call.

jon

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Cc: [McNichol, David](#)
Subject: RE:
Date: Wednesday, May 23, 2012 10:17:32 AM

They make an excellent kielbasa egg and cheese breakfast sandwich! I recommend it!

So I guess ann Charles is still involved. Hum

C

From: Jonathan Gorin [mailto:Gorin.Jonathan@epamail.epa.gov]
Sent: Wednesday, May 23, 2012 10:10 AM
To: McGowan, Carrie
Cc: McNichol, David
Subject:

Dave, Carrie thanks for meeting yesterday, hopefully we'll be able to finish up tomorrow - at least on the FS comments

Anne Pavelka sent me an e-mail yesterday with some comments from Ann Charles. Same old points on fill vs. site related contamination. In my response, i asked them to provide you assistance in developing alt GW criteria.

Ann Charles asked that you send your request for assistance to her, Anne and David Van Eck (e-mail addresses below). Please cc' me as well.

See you tomorrow,

jon

"Pavelka, Anne" <Anne.Pavelka@dep.state.nj.us>, "Van Eck, David" <david.vaneck@dep.state.nj.us>,
"Charles, Ann" <Ann.Charles@dep.state.nj.us>

ps, i picked up a sandwich at that Polish deli. Really good, and very cheap (at least compared to Manhattan)

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From: [McGowan, Carrie](#)
To: Gorin.Jonathan@epamail.epa.gov
Subject: Tax map
Date: Tuesday, October 16, 2012 11:11:12 AM

To: Jonathan Gorin/R2/USEPA/US@EPA

[attachment "taxmap128(ISP&LCP)[1].pdf" deleted by Jonathan Gorin/R2/USEPA/US]

Jon,

As requested.

Carrie

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